

**CHAITMAN LLP**

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*Attorneys for Aaron Blecker*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)  
SIPA LIQUIDATION  
(Substantively Consolidated)

**REPLY DECLARATION OF HELEN DAVIS CHAITMAN  
IN FURTHER SUPPORT OF MOTION TO COMPEL  
THE TRUSTEE TO ALLOW AARON BLECKER'S SIPC CLAIM**

I, HELEN DAVIS CHAITMAN, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm of CHAITMAN, LLP, counsel to Aaron Blecker in the captioned matter. I submit this reply declaration in further support of our motion to compel the Trustee to allow Aaron Blecker's SIPC claim. Annexed hereto are the following Exhibits:
2. Exhibit 1 is Exhibit D17 to the Supplemental Expert Report of the Trustee's expert Lisa Collura dated December 17, 2015 ("Collura Report").
3. Exhibit 2 is Exhibit D18 to the Collura Report.

4. Exhibit 3 is a copy of letter to Bernard L. Madoff dated August 19, 1994, produced by the Trustee. (MADTBBO1989184).

5. Exhibit 4 is a copy of a letter to Madoff dated October 20, 1994 produced by the Trustee. (MADTBBO1989183).

6. Exhibit 5 is a copy of a letter to Madoff dated March 24, 1995 produced by the Trustee. (MADTBBO1989181).

7. Exhibit 6 is a copy of a letter to Madoff dated January 3, 1995 produced by the Trustee. (

8. Exhibit 7 is a copy of a letter to Madoff dated April 6, 2007 produced by the Trustee. (AMFO0189624).

9. Exhibit 8 is a copy of Aaron Blecker's Madoff statement dated March 31, 1995.

10. Exhibit 9 is a copy of Aaron Blecker's Madoff statement dated May 31, 1995.

11. Exhibit 10 is a copy of the transcript of the deposition taken of Aaron Blecker on July 1, 2014.

12. Exhibit 11 is from the December 17, 2015 report of Matthew Greenblatt, submitted by the Trustee.

Dated: New York, New York  
February 10, 2016

**CHAITMAN LLP**

By: /s/ Helen Davis Chaitman  
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**CERTIFICATE OF SERVICE**

I, Helen Davis Chaitman, hereby certify that I caused a true and correct copy of the foregoing document with exhibits to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail.

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I certify under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
February 10, 2016

/s/ Helen Davis Chaitman